## Meeting Minutes Inter Agency Management Integration Team (IAMIT) EPA Conference Room 712 Swift Blvd., Richland July 23, 1996

Appv1.:	C. A. Hansen, RL IAMIT Representative	Date:	8/27/6
Appvl.:	D. R. Sylerwood, EPA IAMIT Representative	Date:	3/27/96
Appvl.:	M. A. Wilson, Ecology IAMIT Representative	Date:	8/27/96
Prepared Appvl.:	F. T. Calapristi Westinghouse Hanford Company	Date:	8/27/96
	Attendees		

cc:		
Goodenough, J. [	). RL	H0-12
McClain, L. K.	RL	H0-12
Mecca, J. E.	RL	R3-79

RL A5-11 BHI H0-11



IAMIT23.JUL

W/Attachments

# Inter Agency Management Integration Team EPA Conference Room 712 Swift Blvd., Richland July 23, 1996

IAMIT Representatives: Doug Sherwood, Mike Wilson, Charlie Hansen WHC Tri-Party Agreement Integration: Larry D. Arnold Recorder: Frank T. Calapristi

#### 1. Approval of June Meeting Minutes

The IAMIT reviewed and approved the minutes for the May 25, 1996 IAMIT meeting.

2. Status of the Public Comment Period for the Community Relations Plan (CRP)

It was reported public forums were held in Seattle and Richland and there were many good comments submitted. A focus group meeting was held in Portland, OR with the stakeholders; however, the meeting was not as fruitful as the Seattle and Richland meetings. The public comment period is scheduled to be completed on July 31, 1996.

It was also noted, the draft CRP recommends deletion of the microfilm files in the Public Information Repositories (PIRs). However, recent WHC visits to the PIR's indicates public use of the files and the recommendation to delete the microfilm files should be reconsidered.

3. Regulator Involvement in the Preparation of Milestone Review Presentations.

Note: Prior to the start of discussions, Ecology announced that Melodie Selby will coordinate Ecology activities for the Milestone Reviews and IAMIT meetings; including the submittal of topics for the IAMIT agenda.

Mike Wilson (Ecology) opened the discussion by stating past Tri-Party Agreement Milestone Reviews had "spotty" results. It was also noted by Ecology and EPA that this mornings TWRS Tri-Party Agreement Milestone Review did not follow meeting guidelines and consequently did not cover the significant problem areas affecting TWRS Tri-Party Agreement milestones.

Ecology and EPA suggested the meetings would be more productive with their participation in the milestone presentations. A draft letter from G. Sanders (RL) to the RL Staff (Attachment 1) was reviewed and the three parties agreed to the following:

The letter would be revised to include signatures by RL, EPA and Ecology IAMIT representatives and would be communicated by each IAMIT representative to their respective staff personnel.

The letter will require the project managers from the three agencies to join together in preparing the Tri-Party Agreement milestone presentations. RL will make the presentation and be followed by a project manager from Ecology or EPA who will present a regulator view of the milestone status. Both project managers will have prior knowledge of each others presentation.

Action:

Draft letter for distribution to RL, EPA and Ecology,

to be signed by the IAMIT representatives.

Due: 7/25/96

Resp.:

L. Arnold

4. Regulatory Integration and Process Improvement (RIPI) Streamlining Efforts

The discussion opened with an outline of the presentation and its objective; followed by the results of Regulatory Integration and Process Improvement (RIPI) streamlining and the future role of RIPI (Attachments 2A, 2B, 2C)

It was reported RIPI streamlining resulted in a soft dollar cost savings of over \$90 million (one-half from negotiations of the Part B Permit) and \$1.5 million in hard dollar savings.

However, most of the discussion focused on the future role of RIPI. Topics included questions on where should RIPI focus its time and should IAMIT identify problem areas for RIPI? Several scenarios were discussed which would require RIPI involvement; however, there was no final recommendation by the IAMIT. Consequently, the following action item was assigned.

Action:

Draft a memo to the three agencies to describe the RIPI process, so that non Tri-Party Agreement related issues may be directed to the IAMIT

Draft a proposal to utilize RIPI as a clearing house for regulatory streamlining activities and also outline the IAMIT role in this process

Present the draft proposals at the August IAMIT meeting

Resp.:

Nancy Darling

Due: August 27, 1996

#### 5. Format for Disposition of Eight Reactors

Larry Arnold, (WHC) discussed the Tri-Party Agreement background. It was noted that a change request issued in 1993, as part of Tri-Party Agreement Amendment Four, contained a commitment to complete negotiations by December 1996 for a disposition plan to dispose the eight reactors. Consequently, there is a need to immediately schedule negotiations.

In response to a question on the regulators definition of "Disposition", EPA said this was defined in Section 8 of the Tri-Party Agreement.

Ecology recommended that an informal meeting or workshop should be held prior to start of formal negotiations. EPA recommended the meeting to be held in September. It was mutually agreed to hold the meeting on September 18, since most of the MYPP discussions will have been completed by this time. The meeting agenda will focus on key issues to be negotiated and discuss the following questions:

- Is the technical logic, used in developing the reactor EIS/ROD, still applicable today?
- Are the cost estimates for disposal of the reactors still accurate?
- What is the residual risk in leaving the reactors next to the river?

#### 6. Change Requests

The following change request was approved by the IAMIT.

M-16-96-02: Establish 200-ZP-1 IRM Milestones (Attachment 3)

Change Request "M-34-96-01, Removal of K-Basins Fuel and Sludge" was discussed by the IAMIT. EPA noted the change request is one where EPA and Ecology have overlapping interest. EPA expressed two concerns:

- Impact of the change request on ground water clean-up activities.
   EPA wants assurance that contaminants from the basin will not enter the groundwater.
- There is no milestone for final clean-up of K-Basins; although this is a public expectation. EPA recommended the M-34-00 milestone contain a requirement for final clean-up and that this commitment will be signed by the Tri-Party Agreement signatories.

#### **AGENDA**

IAMIT MEETING
JULY 23, 1996
EPA CONFERENCE ROOM
712 SWIFT BLVD., STE. 5
1:15 PM - 4:00 PM
(CHAIRPERSON: M. A. WILSON)

1:15 pm APPROVAL OF JUNE MEETING MINUTES  1:20 pm STATUS OF THE COMMUNITY RELATIONS PLAN (J.YERXA, R. HARPER, D.FAULK)  1:45 pm REGULATOR INVOLVEMENT IN PREPARATION OF MILESTONE REVIEW PRESENTATIONS (M. WILSON, D. SHERWOOD, C. HANSEN, G. SANDERS)  2:00 pm RIPI REGULATORY STREAMLINING EFFORTS (C.E. CLARK, N. DARLING)  2:30 pm BREAK  2:45 pm FORMAT FOR DISPOSITION OF EIGHT REACTORS (G. SANDERS, J.D. GOODENOUGH, R.P. HENCKEL, J. ZEISLOFT)  3:30 pm CHANGE REQUESTS  O Approval  * M-16-96-02 Establish 200-ZP-1 IRM Milestones (D. Wanek, T. Wintczak)  O Discussion  * M-34-96-01 Removal of K-Basins Fuel and Sludge (D. Sherwood, R. Holt, C. DeFigh-Price, T. Tebb)			
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* M-34-96-01 Removal of K-Basins Fuel and Sludge			* M-16-96-02 Establish 200-ZP-1 IRM Milestones
			* M-34-96-01 Removal of K-Basins Fuel and Sludge

4:00 pm

**ADJOURN** 

#### **ATTENDEES**

#### INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

JULY 23, 1996

#### EPA CONFERENCE ROOM 712 SWIFT BLVD, RICHLAND

NAME	ORGANIZATION	MAILSTOP	(√) FOR <u>ATTACHMENTS</u>
F.T. CALAPRISTI	WHE/TPAI	B2-35	
M.A. Selby	Ecology	B5-18	
Charles Hansen	USDOE RC	57-41	
Jame & Rasmuse	USDOE RL	AS-15	
Steve Alexander	Eco begg	<u>75-18</u>	
Peter Bengtson	whe	<u> 83-35</u>	
Ron Skinnarlan	Ecology	B5-18	
MIKE WILSON	ECOLOGY		
Doug Sherwood	<u>EPA</u>	<u>85-01</u>	
ICOGER STANLE	Ecology	LACEY	
Laury D. Assuce	WHC/ TPAI	<u>82-37</u>	
Dave Lundstrom	- Balogy	B5-18	
Cliff Clark	DOE-RL	15-15	
Noney Dorlers	WHC:	Lacey	
Day MOSICH	ECOLOGY	LACEY	

#### **ATTENDEES**

#### INTER AGENCY MANAGEMENT INTEGRATION TEAM (IAMIT) MEETING

JULY 23, 1996

EPA CONFERENCE ROOM 712 SWIFT BLVD, RICHLAND

NAME	ORGANIZATION	MAILSTOP	(√) FOR <u>ATTACHMENTS</u>
R.P. HENCKEL	ВНІ	x5-53	
J.J. MEVIRC	BNI	X5-53	
Kevin Oa Les	GPA	85-1	-
RD MORRISON	WHC/TPAZ	B2-35	
Om Waner	DOE	HO-12	<u></u> .
MW Stavensun	WHC/TPAZ	B2-35	
I Thomas Febr	Ecology_	35-18	
Robert 3. Hoes	DOE-RL/SFD	57-41	
George Senden	DOE-RL EAP	A5-15	
	<u> </u>		<del></del>
			<u> </u>

#### DRAFT

To: RL Staff

REGULATOR PARTICIPATION IN PREPARATION OF MONTHLY HANFORD FEDERAL FACILITY AGREEMENT AND CONSENT ORDER (TRI-PARTY AGREEMENT) MILESTONE REVIEW **PRESENTATIONS** 

In the July 23, 1996 Inter Agency Management Integration Team (IAMIT) meeting, representatives of the U.S. Department of Energy (DOE), Richland Operations Office (RL), the State of Washington Department of Ecology (Ecology) and the U.S. Environmental Protection Agency (EPA) discussed the role of regulator involvement in the preparation of Tri-Party Agreement Milestone Review presentations. The IAMIT also discussed joint presentations by RL and the regulators for the milestones under discussion each month.

It was generally agreed the Tri-Party Agreement milestone presentations would be more meaningful if the project managers from the three parties joined together in preparing the presentations. The presentations will continue to be made by RL with the regulatory project managers having full knowledge of the presentation contents. At the completion of the RL presentation, the cognizant regulatory project manager will present a regulators assessment of the milestone status with the RL project manager having full knowledge of the regulator view.

By taking this action to increase three party interaction in the monthly milestone presentations, the result will be a mutual understanding of issues. and improved communication to the IAMIT and program upper management regarding Tri-Party Agreement milestone status and/or issues.

If there are any questions on this policy, I may be contacted on 376-6888.

Sincerely,

G. H. Sanders Hanford Project Manager

cc:

- L. Arnold, WHC
- B. Austin, WHC R. Bacon, WHC
- R. Jim. YIN
- W. Moffitt, WHC
- D. Powaukee, NPT
- A. Trego, WHC
- J. Wilkinson, CTUIR

### RIPI PRESENTATION OUTLINE IAMIT - JULY 23, 1996

**Presentation Objective** To provide an update on streamlining activities at Hanford and seek IAMIT's feedback on RIPI's future role.

#### I. RIPI Background

#### II. Streamlining Update

- A. Tracking Regulatory Successes
- B. Promoting Streamlining The January Session
- C. Resolving Non-TPA Regulatory Issues

#### III. Report on the January Session

- A. Streamlining Defined
- B. Barriers and Solutions Discussed

#### IV. Implementing Solutions

- A. Solutions Already Implemented by RIPI
- B. Most Solutions Need IAMIT Support or Action

#### V. RIPI's Future Role

- A. Where Does IAMIT Want RIPI to Spend Its Time:
- (1) Continue Tracking Successes?
- (2) Draft Proposal for Prioritizing/Implementing Streamlining Solutions?
- (3) Pursue or Abandon the Issue Resolution Process?

# REGULATORY STREAMLINING AT HANFORD BARRIERS AND SOLUTIONS SUGGESTED AT FEBRUARY 24, 1996 SESSION April 10, 1996

April 10, 1990				
BARRIERS	GENERAL SOLUTIONS	SPECIFIC SOLUTIONS		
1. Low Risk Tolerance	1. Senior Staff should actively encourage staff to take appropriate risks in day-to-day decisions.  2. Define legally defensible  3. Educate managers on risk tradeoffs.	1. Senior mgt from all three parties should send a joint letter to staff defining "appropriate risk" and encouraging them to take such risks. Appropriate risk should be based on the definition of legally defensible, keeping the outcome in mind, and common sense. The letter should include a clear message that innovation (not violating regulations but finding creative ways to comply) is encouraged.  2. Legal reps from Ecology, WDOH, EPA, RL contractors should discuss what constitutes legally defensible. If approaches between the parties are different, it should be recognized documented, and distributed to staff.  3. Encourage use of RIPI and IAMIT team when issues are unable to be resolved in a timely manner. IAMIT should make decisions to further regulatory streamlining where appropriate.  4. Schedule a session to discuss/educate managers and staff on risk tradeoffs.		

BARRIERS	GENERAL SOLUTIONS	SPECIFIC SOLUTIONS
2. Zero Risk Incentive for Staff	<ol> <li>Reward risk taking</li> <li>Accept and admit failures and celebrate successes</li> <li>Give staff/mgt incentives for taking risks and making decisions.</li> </ol>	1. Have recognition programs for successful regulatory streamlining. Examples are:  o Showcase individuals in REACH o Senior Mgt letter to individuals/groups applauding and supporting successful regulatory streamlining o Awards Program - Example: Quarterly luncheon with senior management for individuals  2. RL restructure contracts to provide incentives for taking risk.  3. Include regulatory streamlining in individual job descriptions and recognize accomplishments during performance evaluations.
3. No Set of Common Definitions or Values between parties.	1. Develop Set of Common Definitions.	1. Have senior management (IAMIT ?) of RL, Ecology, WDOH, EPA, develop joint guidance to staff on how to evaluate such things as cost effectiveness, appropriate risk, appreciable environmental benefit, etc This guidance should be presented jointly to staff/managers of the parties.

BARRIERS	GENERAL SOLUTIONS	SPECIFIC SOLUTIONS	
4. Unclear roles and authorities within agencies and	1. Clarify roles between RL programs and Projects.	1. RL should clearly define roles internally and then provide written communication of those roles to regulators and contractors.	
contractors	<ol> <li>RL should not act as a roadblock between regulators and contractors.</li> </ol>	2. Contractors must identify their RL customer (program or project) then only take direction on any specific issue from that customer.	
	<ul><li>3. Eliminate regulator turf wars.</li><li>4. Improve single regulator</li></ul>	3. Regulators should clearly define roles among themselves and provide written communication to RL and contractors.	
	approach.  5. TPA milestones are negotiated but cannot be completed without approvals or interfaces with WDOH.	4.Regulators, RL, and contractors should all be involved in developing best way to implement single regulator approach. An approach should be agreed upon and written documentation be provided to staff.	
	-	5. Include WDOH in TPA negotiations when appropriate.	
5. Too Many Existing Procedures and Processes.	1. Eliminate unnecessary Procedures	1. Change policy/approach and stop putting new processes in place to correct every mistake. Provide written management direction to staff on this change. Review Operational Improvement Process (OIP) @ PNNL for application by other contractors.	
6. Lack of Vision Resulting in Short Term Versus Long Term Gains	1. Always keep the end in mind - cost efficient cleanup.	d 1. Schedule time for staff to work on regulatory streamlining ideas and approaches make it part of their job duties.	
	<ol> <li>Mgt guidance needed on conflicting priorities</li> <li>Forward looking problem solving</li> </ol>	2. Priorities for agencies and contractors should be developed annually and reviewed quarterly. Parties should develop priorities in consultation with each other. Joint priorities should be included for regulatory streamlining.	

BARRIERS	GENERAL SOLUTIONS	SPECIFIC SOLUTIONS
7. Lack of Trust Among Parties	1. Increase team building 2. Develop common definitions and approaches among parties for such things as evaluating cost effectiveness, appreciable environmental value, etc. 3. Change culture 4. Focus on mutual goals 5. More leadership from senior management on trust issue 6. Talk first, then write 7. Minimize inconsistent interpretations and applications of rules. 8. Open communication	1. Hold team building sessions for both management and staff jointly for Ecology, EPA, WDOH, RL, and contractors. The Ropes Course at the CISPUS Environmental Learning Center is suggested.  2. RL/Contractors should inform regulators if regulatory proposals are conservative or "on the edge". This up front presentation by RL/Contractors will build trust with the regulators. Management should communicate this approach to staff in writing.  3. The regulators should follow precedent set at other facilities when regulating Hanford unless there are tangible reasons to do otherwise. Management should communicate this approach to staff in writing.  4. Direct one-on-one communication between regulators and contractors should be encouraged not discouraged.
8. Poor Communication	<ol> <li>The RIPI Team needs to better communicate about regulatory streamlining with staff.</li> <li>More direction is needed from senior management on regulatory streamlining.</li> </ol>	<ol> <li>RIPI Team should use organizations staff meetings to present information on regulatory streamlining and explain how to document regulatory streamlining successes and proposals.</li> <li>RL should encourage more openness and less "dry runs".</li> <li>Honest cross evaluations should be performed between the parties on what each can do to increase the efficiency of the cleanup. Evaluations should also be done on a regular basis (twice yearly?).</li> </ol>

### **RIPI**

- \* Means Regulatory Integration and Process Improvement
- \* Team Members represent DOE, Ecology, DOH, Westinghouse, Bechtel, PNL, and EPA
- \* RIPI Created by the Cost and Management Efficiency Initiative
- \* RIPI Signed into Existence by the Tri-Party Senior Executive Committee in 1994
- \* RIPI's Marching Orders:

Track Regulatory Successes

Promote Streamlining Goals

Help to Resolve Non Tri-Party Regulatory Issues

## Tracking Regulatory Successes

- \* RIPI's Success Inventory Has 106 Entries 30 Will Be Added in the Next Month
- \* Cost Savings Have Been Estimated For Many Projects
- \* Format Changes Are Expected

### Promoting Streamlining

- \* Approximately Forty-Five Staff From DOE, Ecology, DOH and Hanford Contractors Attended a January Streamlining Session
- \* Staff Were Asked To:

Define Regulatory Streamlining

Identify Streamlining Goals

Propose How to Address Barriers to Streamlining

### RIPI's Issue Resolution Process

- \* The Issue Must Involve Environmental Compliance
- \* The Issue <u>Cannot</u> Be Subject To the TPA Dispute Resolution Process
- \* Agreement Is Needed by All Parties Before RIPI Will Become Involved
- \* RIPI Acts as a Facilitator, Not a Decisionmaker
- \* If Parties Are Unable To Identify A Mutually Agreeable Solution, RIPI Can Elevate the Issue To IAMIT For A Decision

# Regulatory Streamlining Is:

- \* Keeping the Big Picture in Mind
- \* Innovative
- \* Not Zero Risk
- \* Teamwork
- \* Process Improvement
- \* Legally Defensible
- \* Based on Trust
- \* Cost Effective
- \* Accomplishes Cleanup!

## Barrier and Solution Example

- \* **Barrier:** Zero Risk Incentive for Staff To Explore and Implement Regulatory Streamlining
- \* Solutions Proposed:
  - 1) Reward Streamlining Efforts
    Through Special Recognition
  - 2) Include Regulatory Streamlining as a Job Description Component
  - 3) Require Streamlining to be a Key Consideration in Decisionmaking

# Implementing Solutions

### To Improve Communication, RIPI Has:

- \* Met with Internal Groups to Discuss Streamlining
- \* Appeared in the Reach
- \* Conducted an Informal Survey

But...Most Solutions Need LAMIT Support or Action

		<del></del>		
Change Number	Federal Facility Agreem		Date	
M-16-96-02 .	Change Con On not use blue ink. Type		July 8, 1996	
Originator	,	. Р	Phone	
J. R. Freeman-Pollard	•	(	509) 372-9347	
Class of Change [] [ - Signator	ies [X] ii - Executive	• Manager (] III -	- Project Manager	
Change Title				
200-ZP-1 PHASE II/III	IRM ACTIVITIES AND ASSO	CIATED MILESTONE CHANG	E PACKAGE	
Description/Justification of	Change		•	
Approval of this chan Tri-Party Agreement m	ge request would result ilestones:	in the addition of the	following 200-ZP-1	
Milestone	<u>Description</u>	:	<u>Due Date</u>	
	operation of a 150 gpm of 150 gpm	treatment system	8/31/96	
	the 300-500 gpm treatment operable Unit).	nt system upgrades	8/31/97	
	Party Agreement milestone IRM to proceed efficient		ementation of the	
	· · · · · · · · · · · · · · · · · · ·	·	_	
Impact of Change				
Approval of this change request will result in the addition of 200-ZP-1 Tri-Party Agreement milestones.				
Affected Documents				
Hanford Federal Facility Agreement and Consent Order Action Plan, Appendix D and the 200-ZP-1 IRM Phase II and III Remedial Design Report DOE/RL-96-07.				
Approvals  OHOME  DOGE  FRA  EFA  FRA  FRA  A  A  A  A  A  A  A  A  A  A  A  A	Dayte /	Approved Disapproved Approved Disapproved Approved Disapproved		